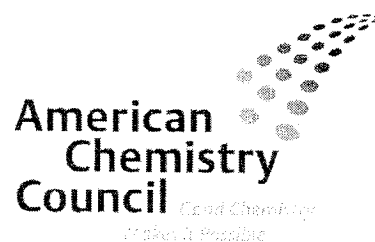


COURTNEY M. PRICE  
VICE PRESIDENT  
CHEMSTAR



July 11, 2003

Via US Mail and e-mail

Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 2211

**Re: Rubber and Plastic Additives (RAPA) Panel  
Partial Revision of HPV Chemical Challenge Program Submission  
1,3,5-tris(3,5-di-tert-butyl-4-hydroxybenzyl)-1,3,5-triazine-2,4,6 (1H,3H,5H) -trione (CAS number 27676-62-6)**

Dear Administrator:

The RAPA Panel of the American Chemistry Council is pleased to submit the attached documents to EPA's High Production Volume (HPV) Chemical Challenge Program (Program) to fulfill our commitment for one of the 37 chemicals the RAPA Panel is voluntarily sponsoring in the Program. The RAPA Panel consists of the following member companies: Alco Chemicals; Bayer Polymers LLC.; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; Noveon, Inc.; and, R.T. Vanderbilt Company, Inc.

This submission consists of a Test Plan and Robust Summaries for CAS number 27676-62-6, and constitutes part of a revision of documents previously submitted to the Program by the RAPA Panel. In the previous submission, dated December 18, 2001, CAS number 27676-62-6 was included in a category called "Hindered Phenols." In comments dated December 5, 2002, EPA noted that "the data provided by the sponsor support the category with respect to the physicochemical, environmental fate and ecotoxicological properties of these substances; the health endpoints are less well supported." Comments received from Environmental Defense (dated May 23, 2002) also noted questions about the "Hindered Phenols" category. Accordingly, revised Test Plans and Robust Summaries for the eight chemicals that comprised the former "Hindered Phenols" category will be submitted as two categories (Styrenated Phenols and Bridged Alkyl Phenols) plus two stand-alone chemicals (CAS number 68610-51-5 and this submission, for CAS number 27676-62-6). CAS number 68610-51-5 and documentation of the revised categories will be submitted separately.

This submission also is being sent electronically to the following e-mail addresses:

[Oppt.ncic@epa.gov](mailto:Oppt.ncic@epa.gov)  
[Chem.rtk@epa.gov](mailto:Chem.rtk@epa.gov)

If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or [anne\\_lehuray@americanchemistry.com](mailto:anne_lehuray@americanchemistry.com).

Sincerely yours,

Attachments



Responsible Care®

2003 JUL 15 AM 10:27  
RECEIVED  
OPPT CBIC